REMARKS

As a preliminary matter, Applicants have amended claim 10 to correct the minor typographical error objected to by the Examiner. In addition, Applicants resubmit the amendments to claim 18 first submitted in the response dated April 29, 2005. As the Examiner notes, that response incorrectly labeled amended claim 18 as being "Original." The error was unintentional and due to an administrative oversight. To correct the error and to ensure that the amendment to claim 18 is entered, Applicants resubmit claim 18 as that claim was amended in the April 29 response, and without adding new matter. Amended claim 18 is now correctly labeled as being "Currently Amended." In view of these amendments, Applicants respectfully request that the Examiner enter the amendments into the record and withdraw the claim objections.

Turning now to the rejections, the Examiner maintains the §103(a) rejection of claim 1 over the article to Faccin in view of the patent to Daly. Applicants respectfully disagree. Claim 1 is directed to a method that allows a dual mode mobile station to receive broadcast teleservice messages originating from a Broadcast Message Center in a circuit-switched network while camped on a control channel of a packet-switched network. Neither Faccin nor Daly, alone or in combination, teach or suggest, an internetworking function having a formatter that translates broadcast teleservice messages from a first protocol used in a circuit-switched network, to a second protocol used in the packet-switched network.

Before discussing the cited references, it is important to note the difference between "translat[ing] broadcast service messages" as recited by claim 1, and "encapsulating" messages as disclosed both Faccin and Daly. As defined in the Wiley Electrical Electronics Engineering Dictionary (copy attached), translation entails a conversion of a file (e.g., the broadcast teleservice message of the claimed invention) from one format to another format. Wiley Electrical Electronics Engineering Dictionary, 800 (2004). After translation, the underlying file is

no longer readable in the original format. Thus, in the context of the claimed invention, the broadcast teleservice message is no longer readable in the circuit-switched protocol after translation to the packet-switched protocol.

"Encapsulation," in contrast, is defined as "[a] technique which enables a network to send data utilizing one protocol, through another network using [a] different protocol. It does so by encapsulating packets using one network protocol _within packets being transmitted through the other network_." _Wiley Electrical Electronics Engineering Dictionary_, 256 (2004) (emphasis added). In other words, encapsulation simply wraps a packet of data (formatted according to a first protocol) within another packet formatted according to a second protocol without altering the encapsulated data. Thus, the encapsulated data is still readable in the original first format upon receipt. Faccin and Daly both teach encapsulation used in tunneling messages between networks, not translation.

The article to Faccin, for example, explicitly discloses that, "a PDP context is a two-way tunnel between the SGSN and the GGSN used to carry encapsulated user packets." _Faccin_, pg. 50, right column, ll. 16-18 (emphasis added). According to Faccin, "this tunneling concept is a key element of mobility management model for GPRS-136." _Faccin_, pg. 52, left column, ll. 5-6. By tunneling, Faccin means transmitting encapsulated packets of data between the GPRS and IS-136 networks without altering the underlying data. The Faccin article itself provides proof of this fact. "A Class B 136 MS interacts with an IS-136 MSC by tunneling IS-136 signaling messages transparently through the SGSN. The SGSN does not interpret the IS-136 messages." _Faccin_, pg. 52, left column, ll. 6-10.

The Examiner cites Daly for its teaching of a teleservice center. However, Daly does not teach that the teleservice center translates messages. In contrast, Daly explicitly discloses that "[t]he teleservice server encapsulates the incoming data from the R-Data message handler into the appropriate GUTT format and packages it into an IS-41 SMDPP transport message." _Daly_,

col. 5, II. 35-38 (emphasis added). Thus, both cited references teach encapsulating messages, not translating broadcast teleservice messages as recited by claim 1. In the cited art, there is no protocol conversion, but rather, data is moved between networks without alteration.

Simply put, the cited art does not teach or suggest, alone or in combination, claim 1. Faccin provides an overview that generally describes GPRS and IS-136 integration. Daly discloses a teleservice center that encapsulates point-to-point messages for delivery to a mobile station. Neither reference suggests modifying the GPRS/IS-136 network disclosed by Faccin to include the teleservice center of Daly specifically to translate broadcast teleservice messages from a circuit-switched protocol into a packet-switched protocol for delivery to a mobile terminal. Indeed, Daly (upon which the Examiner relies specifically for the teleservice messages) encapsulates its messages for delivery to a mobile station in an IS-41 (i.e., a circuit-switched protocol) transport message. Thus, the §103 rejection to claim 1 fails.

The Examiner also rejected claims 10, 16, and 21 under §103(a) over the same references and for the same reasons as those cited above for claim 1. However, each of claims 10, 16, and 21 contain language similar to that of claim 1, and thus, are patentably non-obvious over the cited art for reasons similar to those stated above.

For the foregoing reasons, the §103 rejections fail. As such, Applicants respectfully request allowance of all pending claims.

Respectfully submitted,

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